

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

**IN RE:**

**JOHN WILLIAMS  
DEANNA WILLIAMS,**

**DEBTORS.**

**Case No.: BK-15-13717-JDL  
Chapter 13**

**OBJECTION TO CHAPTER 13 PLAN OF DEBTORS**

Comes now the secured creditor, Nationstar Mortgage, LLC, hereinafter referred to as “Nationstar”, by their attorney, Jim Timberlake, and hereby objects to the Chapter 13 Plan of Debtors. In support of this Objection, Nationstar Mortgage, LLC would show the Court as follows:

1. Nationstar Mortgage, LLC is the holder of a purchase money note and mortgage on the real property, ("mortgaged property") of Debtors located at 1500 McDonald Dr, Midwest City, OK 73110. Said note and mortgage has an outstanding balance of \$54,750.04 plus accruing interest along with reasonable attorney fees and for all costs of the action.

2. The Debtor's plan proposes a cramdown on the debt owed to Nationstar. While Nationstar disputes the value of the property (and subject to separate motions), asserted by the Debtors, Nationstar objects to proposed treatment of its secured claim as the secured debt (in whatever value determined) will not be paid in full within the term of the proposed Chapter 13 Plan and as required by 11 U.S.C. § 1325(a)(5)(b)(ii).

3. It is the belief of Nationstar that the subject property is rental/investment property of the Debtors and the subject property is either unoccupied or generating income insufficient to support the secured debt of Nationstar. Accordingly, the subject property is a burden on the estate and unnecessary to an effective reorganization.

WHEREFORE, PREMISES CONSIDERED, secured creditor, Nationstar Mortgage, LLC, moves the Court to reject the proposed Chapter 13 Plan of Debtors and/or to grant adequate

protection or such other and further relief as may be entitled.

NATIONSTAR MORTGAGE, LLC,

By: s/ Jim Timberlake  
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Attorney for Movant

**CERTIFICATE OF SERVICE**

I hereby certify that I mailed a true and correct copy of the above and foregoing Objection with postage thereon fully prepaid to the parties listed below on November 10, 2015.

John Williams  
DeAnna Williams  
3320 Norcrest Drive  
Oklahoma City, OK 73121

The following persons should have received notice of the above and foregoing instrument on the same day it was filed by the Court's CM/ECF Electronic Noticing System.

John Hardeman  
P.O. Box 1948  
Oklahoma City, OK 73101

Gabriel Rivera  
PO Box 7837  
Moore, OK 73153-1837

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